



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 38th Floor  
New York, New York 10278

July 14, 2025

**By ECF**

The Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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**Re: United States v. Juan Calderon, S9 21 CR 93 (VM)**

Dear Judge Marrero,

The Government writes further on behalf of the parties in the above-captioned case and in response to the Orders of the Court dated July 2, 2025 (*see* ECF No. 389) and July 11, 2025 (*see* ECF No. 394). The Government and Defendant Juan Calderon both anticipate that a joint letter from his co-defendants will be filed on or about tomorrow, July 15, 2025, which is sixty days from the last conference on May 16, 2025 and the date by which the Court requested such a letter from the defendants proposing a schedule for the submission of pretrial motions, among other things. (*See* 05/16/2025 Tr. 30:18-21). With the consent of Defendant Juan Calderon, the Government requests leave from the Court to respond to the omnibus letter of the defendants on July 18, 2025 and in that same response propose an approach to the filed motion of Defendant Juan Calderon. The Government believes that this approach will both respect judicial economy as well as allow the Government to take a position that is coherent in light of the proposed approach of both Defendant Juan Calderon as well as all the other defendants before the Court.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

**SO ORDERED.**

7/15/2025

DATE

  
VICTOR MARRERO, U.S.D.J.

By: Thomas John Wright  
Michael R. Herman  
Timothy Ly  
Thomas John Wright  
Assistant United States Attorneys  
(212) 637-2221 / 1062 / 2295

cc: Ruth Liebesman (Counsel to Defendant Juan Calderon) (by ECF)  
All Counsel and Coordinating Discovery Attorney (by ECF)